

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

4D FACTORY, INC., et al.,

Debtors. <sup>1</sup>

-----X  
THE 4D FACTORY LLC,

Plaintiff,

-against-

MARK LONG, COLIN FORAN,  
NAOMI LACKAFF, AARON NONIS,  
DON NORBURY, MARK YEEND,  
CALVIN ZHOU, GRIFFIN GAMING  
PARTNERS II, L.P., GRIFFIN GAMING  
PARTNERS II SIDE FUND, L.P., POLYCHAIN  
VENTURES II LP, POLYCHAIN VENTURES II  
(PARALLEL) LP, PIERRE-EDUOARD  
PLANCHE, BENJAMIN PERSZYK,

JOSH ROSENTHAL,

Defendants,

and

NEON MACHINE, INC., ARGON PROTOCOL  
FOUNDATION, ARGON ASSET VENTURES  
CORP.

Nominal Defendants.

-----X  
GRIFFIN GAMING PARTNERS II, L.P., GRIFFIN  
GAMING PARTNERS II SIDE FUND, L.P.,  
POLYCHAIN VENTURES II LP, POLYCHAIN  
VENTURES II (PARALLEL) LP,

Counterclaim-Plaintiffs, v.

THE 4D FACTORY LLC,

Counterclaim-Defendant.

Chapter 11  
(Subchapter V)  
Case No.: 23-11618 (MEW)  
(Jointly Administered)

Adv. Pro. No. 24-01319 (MEW)

**MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are 4D Factory Inc. (6770), and The 4D Factory LLC (8935).

-----X  
GRIFFIN GAMING PARTNERS II, L.P., GRIFFIN  
GAMING PARTNERS II SIDE FUND, L.P.,  
POLYCHAIN VENTURES II LP, POLYCHAIN  
VENTURES II (PARALLEL) LP,

Third-Party Plaintiffs,

v.

CORT JAVARONE, SCOTT HONOUR, and STEVE  
HOROWITZ,

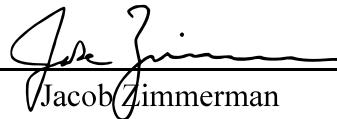
Third-Party Defendants.  
-----X

Jacob Zimmerman, hereby requests admission, *pro hac vice*, before the Honorable Michael E. Wiles, to represent counterclaim defendants Cort Javarone, Scott Honour, Steve Horowitz, and Neon Media LLC.

I certify that I am a member in good standing of the bars of the State of Minnesota and the State of Colorado, the U.S. District Court for District of Minnesota, and the United States Court of Appeals for the Federal Circuit.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: May 3, 2024

  
\_\_\_\_\_  
Jacob Zimmerman

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

4D FACTORY, INC., et al.,

Debtors.<sup>2</sup>

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THE 4D FACTORY LLC,

Plaintiff,

-against-

Chapter 11  
(Subchapter V)  
Case No.: 23-11618 (MEW)  
(Jointly Administered)

Adv. Pro. No. 24-01319 (MEW)

MARK LONG, COLIN FORAN,  
NAOMI LACKAFF, AARON NONIS,  
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VENTURES II LP, POLYCHAIN VENTURES II  
(PARALLEL) LP, PIERRE-EDUOARD  
PLANCHE, BENJAMIN PERSZYK,  
JOSH ROSENTHAL,

Defendants,

and

NEON MACHINE, INC., ARGON PROTOCOL  
FOUNDATION, ARGON ASSET VENTURES  
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Nominal Defendants.

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GRIFFIN GAMING PARTNERS II, L.P., GRIFFIN  
GAMING PARTNERS II SIDE FUND, L.P.,  
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GAMING PARTNERS II SIDE FUND, L.P.,  
POLYCHAIN VENTURES II LP, POLYCHAIN  
VENTURES II (PARALLEL) LP,

Third-Party Plaintiffs,

v.

CORT JAVARONE, SCOTT HONOUR, and STEVE  
HOROWITZ,

Third-Party Defendants.  
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**ORDER GRANTING ADMISSION TO PRACTICE, *PRO HAC VICE***

Upon the motion of Jacob Zimmerman, to be admitted, *pro hac vice*, to represent Cort Javarone, Scott Honour, Steve Horowitz, and Neon Media LLC in the above-referenced adversary proceeding, and upon the movant's certification that the movant is a member in good standing of the bar of the State of Minnesota, it is hereby

**ORDERED**, that Jacob Zimmerman, Esq., is admitted to practice, *pro hac vice*, in the above-referenced adversary proceeding to represent Cort Javarone, Scott Honour, Steve Horowitz, and Neon Media LLC, in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

Dated: \_\_\_\_\_, 2024  
New York, New York

\_\_\_\_\_  
THE HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE